EDWIN COOPER

PETROLEUM ADDITIVES

Edwin Cooper Division Sauget, Illinois 62201 (618) 274-4000

May 31, 1984

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Mr. Dan Hopkins
U. S. Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Hopkins:

RE: Proposed Soil Sampling Program
Construction Project ECI Sauget, Illinois

Attached is the sampling plan for the project in the Unit 268 construction site which has been modified based on our discussion of May 29, 1984. Please call me or Jim Sparks at 618-274-4000 if you have any questions related to the revised sampling plan.

Sincerely,

Sam McWilliams Site Manager

pd attachment

cc: D. E. Park - Baton Rouge Plant

D. Bach - Baton Rouge Tower

J. Parsons - Baton Rouge Tower

PROPOSED SOIL SAMPLING PROGRAM

CONSTRUCTION PROJECT

EDWIN COOPER, INC., SAUGET, ILLINOIS

SUMMARY:

ECI will perform area sampling in those areas of the construction project which will be sealed with asphalt or covered with concrete. In those portions of the construction project which will be covered with rock ECI will not perform additional soil samples. This area will remain readily accessible for sampling in the future should further testing be warranted.

Additionally, rather than sample the existing piles of soil individually, we prefer to sample the soil after it has been placed in the dike area prior to covering with asphalt. If any piles of soil should remain and not be placed in the dike area, these piles will be sampled separately.

All samples will be obtained with a stainless steel bucket auger to a total depth of 18 inches. Each sample will be divided into three equal segments: zero to six inches; six inches to twelve inches; and twelve inches to eighteen inches.

Initially only these zero to six inch composited samples from each of the sampling areas will be analyzed. If the analytical results indicate 2,3,7,8 TCDD greater than one part per billion in the surface sample, the composite from the next level (six inches to twelve inches) will be analyzed. Analysis of the twelve inch to eighteen inch sample and additional samples as may be required will also be completed should further testing be required.

All samples will be analyzed by Envirodyne Laboratories following protocol as outlined under the National Laboratory Contract Program.

All samples will be retained following analysis.

Refer to Attached Drawing

Those areas of the construction project which will be covered with asphalt or concrete are enclosed within the solid read line. The areas with concrete are indicated by diagonal lines; asphalt crossed diagonal lines. A total of eight area samples will be taken. Each areas is designated with a blue number.

Each sampling areas is further segmented into four quadrangles of approximately equal surface area. A single core sample will be taken at a location near the center of each quadrangle. Measurements will be taken from two fixed points and recorded to identify the sampling location should future sampling at that location

Page Two May 31, 1984

be required. The four samples from the quadrangles will be segmented. The segments will be composited by depth from the surface. The compositing of the segments will be completed on site as sampled in a stainless steel pan by use of a stainless steel spatula for mixing. A composited sample will then be placed in amber glass jars with teflon-lined lids. Pressure-sensitive labels will be attached to the sampling jar. The jar will then be sealed in a zip-lock plastic bag. All zero to six-inch segments in the quadrangles in a sampling area will be composited and analyzed as a single sample. Likewise the six-inch to twelve-inch and twelve-inch to eighteen-inch segments will be composited as a single sample. The analytical results will represent the average concentration of 2,3,7,8 TCDD within that sampling area boundary.

